

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW LEE HARRIS,

Defendant.

No. CR 15-083 RAJ

PROTECTIVE ORDER
REGARDING CERTAIN
DISCOVERY ITEMS

This matter having come before the Court on the joint motion of the parties for entry of a protective order regarding certain discovery items, and the Court, having considered the motion and being fully advised in this matter, hereby enters the following Protective Order:

1. The Government shall produce the handwritten notes recovered during the service of the search warrant and during the consent search, without redactions, to defense counsel to comply with the Government's discovery obligations. At the time of production, the Government will designate in writing those discovery items that are subject to this protective order. Items that the Government has designated as subject to the protective order will be referred to as "designated items."

2. Counsel for the defendant will limit possession of copies of the designated items to attorneys of record and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as "members of the defense team"). The attorneys of record and members of the defense team may show to and review

1 with Defendant the designated items. The attorneys of record and members of the defense
2 team are prohibited from providing copies—in either printed or electronic form—of the
3 designated items to Defendant or any other persons. However, the attorneys of record or the
4 defense team may disseminate one electronic copy of the designated items to the Federal
5 Detention Center at SeaTac, Washington, for use in a controlled environment by Defendant
6 while he is in custody there.

7 3. If Defendant files any designated item with the Court, the filing must be
8 sealed, absent prior written permission of the Government to file an unsealed version.

9 4. It is the responsibility of defense counsel to ensure that all members of the
10 defense team who have access to any designated items understand the restrictions of this
11 protective order and agree to abide by those restrictions.

12 5. In the event defense counsel is replaced by new counsel, defense counsel is
13 prohibited from turning any designated items over to new counsel without prior written
14 permission of the Government, which will be granted when it is satisfied that new counsel
15 has accepted, and is bound by, the protective order.

16 6. This order can only be modified by order of the Court.

17 7. If defense counsel believes that the Government has improperly designated an
18 item, it should first meet and confer with the Government to resolve any disputes.
19 Thereafter, defense counsel may challenge the designation by filing a motion with the Court.
20 Pending the ruling on the motion, defense counsel shall treat the item as subject to the
21 protective order.

22 8. The provisions of this Protection Order do not terminate until further order of
23 the Court.

24 DATED this 22nd day of May, 2015.

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27 The Honorable Richard A. Jones
28 United States District Judge